

Attachment 2 - Plan of Operation

PLAN OF OPERATION

INTRODUCTION

This document constitutes the plan of operation for the Garfield County Class IV b Landfill / Dead Animal Pit and is intended to comply with the Utah Division of Solid and Hazardous Waste Administrative Rules. Technical questions and comments may be directed to:

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HANDLING PROCEDURE

Dead animals will be handled in accordance with Administrative Rules and descriptions below. Dead animals received at the facility shall be deposited in the bottom of a disposal trench designated for dead animals. All dead animals will be covered with a minimum of six (6) inches of earth to prevent odors and the propagation and harborage of rodents and insects. Garfield County has arranged for independent contractors to cover the animals 3 times per week. Animals deposited at the landfill will be placed in the disposal trench and covered as soon as practical (but no later than the next day the facility is open). Animals present and actions performed will be recorded on the Disposal Record.

Equipment used at the facility will consist primarily of a tractor owned by Garfield County. When additional equipment is needed it will be borrowed / leased from Garfield County. This may include loaders, trucks, and graders. Other processing equipment may be acquired as funds and needs dictate.

INSPECTIONS AND MONITORING

At least one operator is preferred on site during all times the facility is open to the public to perform inspection and monitoring functions. Inspection and monitoring at the Garfield County Class IV b Landfill / Dead Animal Pit will be conducted in two components; (1) routine and (2) compliance. Routine inspections will be conducted on

incoming loads by the independent contractor as he examines the trench prior to covering.

Compliance inspections will be conducted quarterly to assess the integrity of cover, the condition of side slopes and vegetative cover, and the impacts of erosion. In addition, the detailed annual inspection will include a review to verify compliance with all permit conditions and state and federal regulations. All inspection records will be kept at the Garfield County Courthouse for a minimum of 3 years.

FIRE / EXPLOSION CONTINGENCY PLAN

In the event of a fire or an explosion that prohibits deposition of incoming waste, the landfill will be closed; Incoming waste will be diverted to an alternate facility. Alternate facilities may include other permitted Class IV b landfills in the area, the John's Valley Landfill, the Wayne County Landfill, the Long Valley Landfill, or other future landfill facilities. Upon resolution of the unexpected event, the facility will be reopened.

DUST CONTROL / AIR QUALITY

Fugitive dust is not anticipated to reach unacceptable levels at the Dead Animal Pit due to the granular nature of the predominant soils. If fugitive dust exceeds acceptable levels, actions will be implemented to reduce dust. These actions may include watering access roads, developing wind breaks, altering management scenarios, or other appropriate measures.

LITTER CONTROL

Dead animals do not generally contribute to blowing litter. Active areas are limited; waste is covered shortly after deposition. In addition, access control fencing has been established along the perimeter of the facility. Any litter escaping the perimeter of the landfill will be periodically picked up by hand.

EXCLUSION OF HAZARDOUS WASTE

As a rural dead animal pit, the Garfield County facility is in a favorable position regarding exclusion of hazardous waste. Generally, all waste will be delivered by local, known generators. The waste will be observed as it is deposited. During periods the landfill is open to the public, at least one percent of the vehicles and other suspicious loads will dispose their dead animals near the working face in a manner that permits inspection. The waste generator may be detained while the load is inspected; if unacceptable hazardous substances are encountered, they will not be unloaded, and appropriate authorities will be contacted. Considering the population served, waste

volumes generated, and complexity of the soled waste stream, these measures are considered to be adequate.

DISEASE VECTOR CONTROL

The waste accepted at a Class IV b landfill should not attract possible disease vectors. The primary method for disease vector control at the Garfield County Class IV b Landfill / Dead Animal Pit will be limiting wastes to those types approved by the permit and providing appropriate cover as needed. The cover will consist of a 6-inch minimum layer of earthen material or an alternate cover approved by the **Executive Secretary**. Rodents and other vermin will not be permitted to burrow in the active area of the landfill; and trapping or extinction methods will be implemented to protect the integrity of the disease vector control program.

ALTERNATIVE DISPOSAL

Alternative waste handling procedures for periods when the landfill is not in operation will be similar to procedures for fires and explosions. Waste will be diverted to alternate disposal sites. Alternate facilities may include other permitted Class IV b landfills in the area, the John's Valley Landfill, the Wayne County Landfill, the Long Valley Landfill or other future landfills. Procedures will continue in this manner until operations at the landfill can return to normal.

In the event of equipment breakdown that cannot be repaired in a reasonable time frame, equipment will be borrowed from contributing entities or leased from local distributors. It is the intent of owners and operators to have dedicated equipment at the landfill over a period of time.

TRAINING AND SAFETY PLAN

Garfield County has several employees who have completed Landfill Operator and the Waste Screening training courses provided by the Solid Waste Association of North America (SWANA) and have received training in identification and exclusion of hazardous wastes. Safety procedures will conform to OSHA guidelines. Personnel will be encouraged to participate in additional landfill management, waste screening, safety, and first aid workshops.

RECYCLING

Recycling means extracting valuable materials from the waste stream and remanufacturing them into useable products. Technical recycling expertise is not available, and reliable recycling markets do not exist for solid waste disposed at the Garfield Class IV b Landfill / Dead Animal Pit. No formal recycling or remanufacturing program is anticipated for this facility.

PRELIMINARY ENGINEERING REPORT

UNIT DESIGN

Designs complying with the requirements of R315-310-3 and depicting the boundaries of the landfill unit, borrow and fill areas have been included as Exhibits 6a-6b.

Groundwater monitoring wells and landfill gas monitoring points are not required for Class IV b landfills and do not appear on the maps.

Current unit designs utilize trench style deposition. Trenches are excavated 2 to 6 ft. wide to the maximum depth capable of the excavation equipment (approximately 10 ft.). Future designs may incorporate above ground deposition with maximum fill heights of 12 ft. and side slopes of 4:1 or flatter.

RUN-ON / RUN-OFF CONTROL

Garfield County will control run on and run off resulting from the 25 year event from contacting solid waste and leaving the landfill. This will be accomplished through a series of best management practices including contouring, ditching, and installation of berms. Best management practices will be employed in a manner that prevents unanticipated surface waters from entering or leaving the facility. In addition to the items listed above natural topography and drainage features on adjacent roads will keep surface waters from entering the facility.

FACILITY LIFE

It is anticipated that facility life will exceed with the 10-year life of the permit. Approximately ½ of the available property has been used during the previous 10 to 15 years.

LOCATION STANDARDS

The Garfield County Dead Animal Pit is an existing facility that was previously authorized to accept dead animal. The facility complies with location standards as outlined in R315-305-4(d)(i).

BORROW SOURCES

All borrow for the Garfield County Dead Animal Pit will be obtained from inside the facility's property boundaries. Adequate material exists for daily and final covers. If, for some reason, adequate material becomes unavailable, the County will use other sources within its control.

RUN-OFF COLLECTION, TREATMENT AND DISPOSAL

There are no active collection, treatment or disposal systems planned for the Garfield County Dead Animal Pit. Best management practices will be employed to prevent the development of run-off.